

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

SHELLEY GIPSON

Plaintiff,

V.

**WEATHERFORD COLLEGE OF THE
PARKER COUNTY JUNIOR
COLLEGE DISTRICT**

Defendant.

CASE NO. 4:22-cv-00730-P

(JURY DEMANDED)

PLAINTIFF'S EMERGENCY RULE 56(D) MOTION FOR CONTINUANCE

Pursuant to Rule 56(d) of the Federal Rules of Civil Procedure, Plaintiff Shelley Gipson files this Emergency Motion for Continuance. For the reasons set forth more fully in the accompanying Brief in Support of Emergency Rule 56(d) Motion for Continuance, Plaintiff respectfully requests that this Court defer consideration of Defendant's Motion for Summary Judgment [ECF No. 28], and stay all briefing associated with Defendant's Motion for Summary Judgment, until Plaintiff has an opportunity to conduct discovery essential to justify Plaintiff's opposition to Defendant's Motion for Summary Judgment.

A form Order granting this requested relief is attached hereto.

DATED December 7, 2022.

/s/ Kevin M. Duddleston

Kevin M. Duddleston

Texas Bar No. 00793644

DUDDLESTEN LAW GROUP, PLLC

4347 W Northwest Hwy Ste 130, PMB 325

Dallas, TX 75220

Phone: (214) 833-5228

Facsimile: (469) 457-6785

Email: kevin@duddlestonlawgroup.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that on December 6, 2022, I emailed Defendant's counsel advising that I intended to file the foregoing Plaintiff's Emergency Rule 56(d) Motion for Continuance. Defendant's counsel indicated that he was OPPOSED to the relief requested.

/s/ Kevin M. Duddleston

Kevin M. Duddleston

CERTIFICATE OF SERVICE

I certify a true and correct copy of the foregoing document was filed electronically on the 7th day of December, 2022. Parties may access this filing through the Court's system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Kevin M. Duddleston

Kevin M. Duddleston